# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	) Criminal No. 18 CV 10422
v.	) Violation:
MICHAEL LEBRON	Count One: Felon in Possession of  Ammunition  (18 U.S.C. § 922(g)(1)
	Forfeiture Allegation: ) (18 U.S.C. § 924(d); ) 28 U.S.C. § 2461(c))

## **INDICTMENT**

### **COUNT ONE**

Felon in Possession of Ammunition (18 U.S.C. § 922(g)(1))

The Grand Jury charges that:

On or about September 27, 2018, at Boston, in the District of Massachusetts, the defendant,

#### MICHAEL LEBRON,

having previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, 208 rounds of various caliber ammunition, including 141 rounds of 9mm ammunition, 28 rounds of .40 caliber ammunition, and 39 rounds of .357 caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(1).

# FORFEITURE ALLEGATION (18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

The Grand Jury alleges that:

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1) set forth in Count One of this Indictment, the defendant,

#### MICHAEL LEBRON,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any ammunition involved in or used in any knowing commission of the offense. The property to be forfeited includes 208 rounds of various caliber ammunition including, 141 rounds of 9mm ammunition, 28 rounds of .40 caliber ammunition, and 39 rounds of .357 caliber ammunition.

- 2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendant—
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the Court;
  - (d) has been substantially diminished in value; or,
  - (e) has been commingled with other property which cannot be divided without difficulty;

then, it is the intention of the United States, pursuant to Title 28, United States Code, Section

2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 2, above.

All pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

JOHN A. WORTMANN, JR.

ASSISTANT UNITED STATES ATTORNEY

DISTRICT OF MASSACHUSETTS

District of Massachusetts: November 14, 2018

Returned into the District Court by the Grand Jurors and filed.

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